

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

FREDERICK K. SHORT JR., TAMATHA
COSTELLO

Plaintiffs

v.

NEW JERSEY DEPARTMENT OF
EDUCATION; ANGELICA ALLEN-
MCMILLAN, Commissioner; CHERRY
HILL SCHOOL DISTRICT, CRANFORD
SCHOOL DISTRICT, CRANFORD
OF EDUCATION,

Defendants

Case No. 3:23-cv-21105 – RK-DEA

Hon. Robert Kirsch, U.S.D.J., and
Magistrate Judge Douglas E. Arpert

**NOTICE OF
MOTION TO INTERVENE**

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned, counsel for Edith Maldonado (“Intervenor”), shall move before the Honorable Robert Kirsch, U.S.D.J., at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608 to intervene as a Plaintiff in this lawsuit pursuant Fed. R. Civ. P. 24. In support of this motion, Intervenor submits a Memorandum of Law in Support of the Motion to Intervene, a proposed complaint, and a proposed order.

PLEASE TAKE FURTHER NOTICE that Oral Argument is requested in the event opposition is filed pursuant to Local Rule 78.1(b); and

PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 7.1(e) a proposed form Order is submitted herewith.

WHEREFORE, the moving Intervenor respectfully requests that this Court allow the Intervenor to intervene, to grant her full party status in the instant litigation, and order such further relief as is just and equitable.

Respectfully Submitted,

/s/Karyn L. White

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Attorney for Movant-Intervenor

Date: Jan. 24, 2024

ORDER

THIS MATTER having been brought before the Court upon application of proposed Intervenor Edith Maldonado as Plaintiff in the matter, and the Court having considered the papers submitted, and the arguments of counsel, if necessary, and for other good cause shown,

IT IS on this _____ day of _____, 2024

ORDERED that Edith Maldonado's Motion to Intervene as a Plaintiff in this matter pursuant to Fed. R. Civ. P. 24 is GRANTED; and it is further

ORDERED that Intervenor Edith Maldonado is granted party status as Plaintiff in this action; Intervenor shall file the proposed Complaint within _____ days of this Order.

Hon. Robert Kirsch, U.S.D.J.